

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BRENDAN PICHA and MAX J. HASTINGS,
Individually and on Behalf of All Others
Similarly Situated,

Plaintiffs,

v.

GEMINI TRUST COMPANY, LLC, TYLER
WINKLEVOSS and CAMERON
WINKLEVOSS,

Defendants.

Case No. 1:22-cv-10922-NRB

**NOTICE OF MOTION AND MOTION OF GEMINI INVESTOR GROUP FOR
APPOINTMENT AS LEAD PLAINTIFF AND
APPROVAL OF SELECTION OF LEAD COUNSEL**

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that class members Gregory Ingallina, Bartholomew Ingallina, Tze (“Eddie”) Ling Ng, and Christine Hogan (collectively, the “Gemini Investor Group” or “Movant”) will, and hereby does, move this Court, on a date and at such time as may be designated by the Court, at 500 Pearl Street, New York, NY, 10007, for an Order: (1) appointing Movant as Lead Plaintiff for the class pursuant to Section 27 of the Securities Act of 1933 (the “Securities Act”) and Section 21D(a)(3)(B) of the Securities Exchange Act of 1934 (the “Exchange Act”), as amended by the Private Securities Litigation Reform Act of 1995 (“PSLRA”), 15 U.S.C. §§ 77z-1(a)(3) and 78u-4(a)(3); (2) approving Lead Plaintiff’s selection of Lieff Cabraser Heimann & Bernstein LLP as Lead Counsel for the class; and (3) granting such other and further relief as the Court may deem just and proper.

Dated: February 27, 2023
New York, New York

Respectfully submitted,

**LIEFF CABRASER HEIMANN
& BERNSTEIN, LLP**

By: /s/ Daniel P. Chiplock
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Proposed Lead Counsel for the Class*